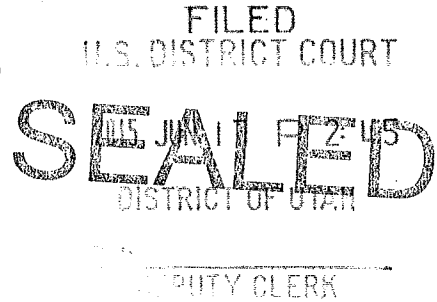


JOHN W. HUBER, United States Attorney (#7226)
 CAROL A. DAIN, Assistant United States Attorney (#10065)
 Attorneys for the United States of America
 185 South State Street, Suite 300
 Salt Lake City, Utah 84111
 Telephone: (801) 524-5682
 Email: carol.dain@usdoj.gov



IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DEJON RAMON WALDRON and
 KYERINDA RASHAI MOORE,

Defendants.

INDICTMENT

VIOLATIONS:

Count I: 21 U.S.C. § 841(a)(1) and 18

U.S.C. § 2, Possession of
 Methamphetamine with Intent to
 Distribute;

Count II: 21 U.S.C. § 841(a)(1) and 18

U.S.C. § 2, Possession of Heroin
 with Intent to Distribute;

Count III: 21 U.S.C. § 841(a)(1) and 18

U.S.C. § 2, Possession of Marijuana
 with Intent to Distribute;

Count IV: 18 U.S.C. § 922(g)(1), Felon
 in Possession of Firearms and
 Ammunition;

Count V: 18 U.S.C. § 924(c)(1)(A),
 Possession of a Firearm in Furtherance of
 a Drug Trafficking Crime;

Count VI: 18 U.S.C. § 922(k),
 Possession of a Firearm with an
 Obliterated Serial Number;

Count VII: 18 U.S.C. § 931, Felon in
 Possession of Body Armor.

Case: 1:15-cr-00041
 Assigned To : Nuffer, David
 Assign. Date : 06/17/2015
 Description: USA v.

The Grand Jury Charges:

COUNT I

(21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)
 (Possession with Intent to Distribute Methamphetamine)

On or about February 12, 2015, in the Northern Division of the District of Utah,
DEJON RAMON WALDRON and KYERINDA RASHAI MOORE,
defendants herein, did knowingly and intentionally possess with intent to distribute 50
grams or more of a mixture or substance containing a detectable amount of
methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. §
812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C.
§ 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT II

(21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)
Possession of Heroin with Intent to Distribute

On or about February 12, 2015, in the Northern Division of the District of Utah,
DEJON RAMON WALDRON and KYERINDA RASHAI MOORE,
defendants herein, did knowingly and intentionally possess with intent to distribute a
quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I
controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein;
all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to
21 U.S.C. § 841(b)(1)(C).

COUNT III

(21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)
Possession of Marijuana with Intent to Distribute

On or about February 12, 2015, in the Northern Division of the District of Utah,
DEJON RAMON WALDRON and KYERINDA RASHAI MOORE,

defendants herein, did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(D).

COUNT IV

(18 U.S.C. § 922(g)(1))

(Felon in Possession of Firearms and Ammunition)

On or about February 12, 2015, in the Northern Division of the District of Utah,

DEJON RAMON WALDRON,

defendant herein, having been convicted of a crime punishable by imprisonment for more than one year, did knowingly possess, in and affecting interstate commerce, firearms and ammunition, to wit: a Vulcan Arms Inc., model V47 762 Rifle, a Glock .40 caliber handgun, Barnaul 7.62 x 39, Smith and Wesson .40 caliber, Fiocchi 9mm, and Winchester .45 auto ammunition; all in violation of 18 U.S.C. § 922(g)(1).

COUNT V

(18 U.S.C. § 924(c)(1)(A))

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 12, 2015, in the Northern Division of the District of Utah,

DEJON RAMON WALDRON,

defendant herein, did knowingly possess firearms, namely, a Glock .40 caliber handgun and a Vulcan Arms Inc., model V47 .762 Rifle, in furtherance of a drug trafficking crime, to wit: the violations of 21 U.S.C. § 841(a)(1) alleged in Counts I, II, and III of this

Indictment, which counts are incorporated 10by reference herein; all in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT VI

(18 U.S.C. § 922(k))

(Possession of a Firearm with an Obliterated Serial Number)

On or about February 12, 2015, in the Northern Division of the District of Utah,

DEJON RAMON WALDRON,

defendant herein, did knowingly possess in and affecting interstate commerce a firearm which manufacturer's and importer's serial number had been removed, altered and obliterated; all in violation of 18 U.S.C. § 922(k).

COUNT VII

(18 U.S.C. § 931)

(Felon in Possession of Body Armor)

On or about February 12, 2015, in the Northern Division of the District of Utah,

DEJON RAMON WALDRON,

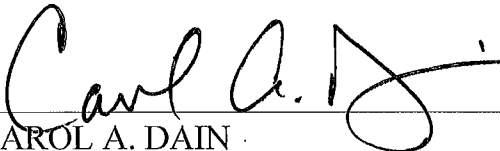
defendant herein, having been convicted of a felony offense that is a crime of violence, as defined in 18 U.S.C. § 16, knowingly and willfully possessed body armor; all in violation of 18 U.S.C. § 931.

A TRUE BILL:

151

FOREPERSON OF GRAND JURY

JOHN W. HUBER
United States Attorney



CAROL A. DAIN
Assistant United States Attorney